

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 05- _____
v.	:	DATE FILED: _____
SHILBA BENNETT	:	VIOLATIONS:
RHONDA STUBBS		18 U.S.C. § 1344 (bank fraud - 1 count)
TANYA THOMPSON	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Summit Bank was a financial institution with offices and bank branches in Pennsylvania, whose deposits were insured by the Federal Deposit Insurance Corporation, certificate number 7406.
2. Defendant **SHILBA BENNETT** was the teller supervisor at Summit Bank's Paoli, Pennsylvania bank branch.
3. Defendant **RHONDA STUBBS** was the retail banking officer at Summit Bank's Wynnewood, Pennsylvania bank branch.
4. Defendant **TANYA THOMPSON** was the teller supervisor at Summit Bank's Wynnewood, Pennsylvania bank branch.
5. In their capacities as Summit Bank employees, defendants **SHILBA BENNETT, RHONDA STUBBS, and TANYA THOMPSON** had access to their assigned

branch's bank vault, Automated Teller Machine ("ATM"), and customers' accounts and certificates of deposit.

6. Defendants **SHILBA BENNETT, RHONDA STUBBS, and TANYA THOMPSON** fraudulently obtained money, that is, approximately \$573,094, owned by and under the care, custody and control of Summit Bank.

7. From in or about February 1996, to in or about December 2000, in the Eastern District of Pennsylvania, defendants

**SHILBA BENNETT,
RHONDA STUBBS, and
TANYA THOMPSON**

knowingly executed, and attempted to execute, a scheme to defraud Summit Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

8. Defendants **SHILBA BENNETT** and **TANYA THOMPSON** removed cash from the vault at Summit Bank's Paoli branch and converted the money to their own use.

9. Defendant **SHILBA BENNETT** removed cash from Summit Bank's Paoli branch ATM and converted the money to her own use.

10. Defendant **TANYA THOMPSON** removed cash from Summit Bank's Wynnewood branch ATM and converted the money to her own use.

11. Defendants **SHILBA BENNETT, RHONDA STUBBS and TANYA THOMPSON** prepared fraudulent savings withdrawal forms to cause the transfer and removal

of money from savings accounts of Summit Bank customers and converted the withdrawn money to their own use.

12. Defendants **SHILBA BENNETT, RHONDA STUBBS** and **TANYA THOMPSON** forged the signature of Summit Bank's customers on forms in order to redeem customers' certificates of deposit, participated in the redemption of those certificates of deposit, transferred the proceeds of the certificates of deposit to savings accounts, withdrew money from the savings accounts, and converted the withdrawn money to their own use.

13. On or about the following dates, defendants **SHILBA BENNETT, RHONDA STUBBS**, and **TANYA THOMPSON** prepared fraudulent withdrawal forms to cause withdrawals from existing Summit Bank savings accounts maintained by Summit Bank customers. In association with these transactions, the defendants removed money from Summit Bank's vaults and converted the money to their own use, as set forth below:

VICTIM A.M.

Date	Last 4 Digits of Account	Defendant	Amount Taken
September 14, 2000	3841	SHILBA BENNETT	\$9,500
September 18, 2000	3841	SHILBA BENNETT	\$9,500
September 25, 2000	3841	SHILBA BENNETT	\$5,000
September 27, 2000	3841	SHILBA BENNETT	\$7,000
September 27, 2000	3841	SHILBA BENNETT	\$9,500
September 28, 2000	3841	SHILBA BENNETT	\$8,000
October 3, 2000	3841	SHILBA BENNETT	\$9,000
October 6, 2000	3841	SHILBA BENNETT	\$9,000
November 9, 2000	3841	SHILBA BENNETT	\$9,500

VICTIM E.S.

Date	Last 4 Digits of Account	Defendant	Amount Taken
September 15, 2000	6143	SHILBA BENNETT	\$8,000

VICTIM A.Mi.

Date	Last 4 Digits of Account	Defendant	Amount Taken
September 18, 2000	7079	SHILBA BENNETT	\$9,500
September 20, 2000	7079	SHILBA BENNETT	\$7,000
September 28, 2000	7079	SHILBA BENNETT	\$5,000
November 6, 2000	7079	SHILBA BENNETT	\$700
November 8, 2000	7079	SHILBA BENNETT	\$3,000
October 30, 2000	7567	SHILBA BENNETT	\$9,500
October 31, 2000	7567	SHILBA BENNETT	\$9,500
November 1, 2000	7567	SHILBA BENNETT	\$9,500
November 2, 2000	7567	SHILBA BENNETT	\$700
November 6, 2000	7567	SHILBA BENNETT	\$3,000
November 7, 2000	7567	SHILBA BENNETT	\$3,000
November 10, 2000	7567	SHILBA BENNETT	\$500

VICTIM M.B.

Date	Last 4 Digits of Account	Defendant	Amount Taken
November 1, 2000	4448	RHONDA STUBBS and TANYA THOMPSON	\$22,389.42
November 10, 2000	4448	TANYA THOMPSON	\$7,000
November 13, 2000	4448	TANYA THOMPSON	\$2,000
November 14, 2000	4448	TANYA THOMPSON	\$7,000
November 30, 2000	4448	TANYA THOMPSON	\$4,000

VICTIM F.W.

Date	Last 4 digits of account	Defendant	Amount Taken
November 7, 2000	1178	SHILBA BENNETT	\$9,500
November 13, 2000	1178	SHILBA BENNETT	\$9,500
November 13, 2000	1178	SHILBA BENNETT	\$9,500
November 16, 2000	1178	SHILBA BENNETT	\$585.91

VICTIM E.D.

Date	Last 4 Digits of Account	Defendant	Amount Taken
November 9, 2000	8338	SHILBA BENNETT	\$9,500
November 12, 2000	8338	SHILBA BENNETT	\$9,500
November 14, 2000	8338	SHILBA BENNETT	\$9,500

VICTIM G.R.

Date	Last 4 Digits of Account	Defendant	Amount Taken
November 8, 2000	1295	TANYA THOMPSON	\$2,000
November 9, 2000	1295	SHILBA BENNETT	\$9,500
November 10, 2000	1295	SHILBA BENNETT	\$9,500
November 27, 2000	1295	TANYA THOMPSON	\$2,000
November 28, 2000	1295	TANYA THOMPSON	\$9,500
November 29, 2000	1295	TANYA THOMPSON	\$9,800
November 30, 2000	1295	TANYA THOMPSON	\$9,800

VICTIM S.E.

Date	Last 4 Digits of Account	Defendant	Amount Taken
November 29, 2000	6718	SHILBA BENNETT	\$9,800

VICTIM E.S.

Date	Last 4 Digits of Account	Defendant	Amount Taken
November 30, 2000	6143	SHILBA BENNETT	\$9,800

VICTIM J.K.

Date	Last 4 Digits of Account	Defendant	Amount Taken
November 8, 2000	9407	TANYA THOMPSON	\$8,000
November 30, 2000	9407	TANYA THOMPSON	\$7,000

VICTIM J.A.

Date	Last 4 Digits of Account	Defendant	Amount Taken
November 24, 2000	9422	TANYA THOMPSON	\$200
November 29, 2000	9422	TANYA THOMPSON	\$2,100
November 30, 2000	9422	TANYA THOMPSON	\$7,000
December 1, 2000	9422	TANYA THOMPSON	\$9,000
December 4, 2000	9422	TANYA THOMPSON	\$3,835
December 6, 2000	9422	TANYA THOMPSON	\$1,000

VICTIM M.K.

Date	Last 4 Digits of Account	Defendant	Amount Taken
December 4, 2000	4101	TANYA THOMPSON	\$4,650
December 4, 2000	8456	TANYA THOMPSON	\$5,350
December 5, 2000	4101	TANYA THOMPSON	\$5,000
December 6, 2000	8456	TANYA THOMPSON	\$5,000

VICTIM A.C.

Date	Last 4 Digits of Account	Defendant	Amount Taken
December 4, 2000	8344	TANYA THOMPSON	\$3,000

VICTIM M.B.

14. On or about November 7, 2000, defendant **RHONDA STUBBS** prepared an Affidavit of Lost Certificate/Passbook and forged the signature of M.B. on the affidavit. Defendant **SHILBA BENNETT** notarized the affidavit. Defendant

TANYA THOMPSON redeemed a certificate of deposit belonging to M.B. and deposited the proceeds from the certificate of deposit totaling approximately \$20,838.48 into an existing Summit Bank savings account maintained by M.B. ending with 4448.

VICTIMS E.D. and G.R.

15. On or about November 8, 2000, defendant **RHONDA STUBBS** prepared a fraudulent Affidavit of Lost Certificate/Passbook and forged the signature of E.D. on the affidavit. Defendant **SHILBA BENNETT** notarized the affidavit. Defendant **STUBBS** prepared documents to open a savings account in E.D.'s name ending with 8338. Defendant **STUBBS** redeemed a certification of deposit belonging to E.D. in the amount of approximately \$64,552.45, divided up the proceeds, and deposited approximately \$34,522.15 into a Summit Bank savings account opened in E.D.'s name ending with 8338 and approximately \$30,000 into an existing Summit Bank savings account maintained by G.R. ending with 1295.

VICTIMS S.E., G.R. and E.S.

16. On or about November 28, 2000, defendant **RHONDA STUBBS** prepared a fraudulent Affidavit of Lost Certificate/Passbook and forged the signature of S.E. on the affidavit. Defendants **STUBBS** and **TANYA THOMPSON** prepared documents to open a savings account in S.E.'s name ending with 6718. Defendants **STUBBS** and **THOMPSON** redeemed a certification of deposit belonging to S.E. in the amount of approximately \$89,331.57, divided up the proceeds, and deposited approximately \$25,000 into an existing Summit Bank savings account maintained by G.R. ending with 1295, approximately \$37,024.27 into a Summit Bank savings account

opened by defendants **STUBBS** and **THOMPSON** in S.E.'s name ending with 6718, and approximately \$27,307.30 into an existing Summit Bank savings account maintained by E.S. ending with 6143.

VICTIM S.B.

17. On or about November 30, 2000, defendant **RHONDA STUBBS** redeemed a certification of deposit belonging to S.B. in the amount of approximately \$25,829.63, withdrew the proceeds of the certificate of deposit from Summit Bank's Wynnewood branch, and converted the money to her own use.

VICTIMS J.F. and J.A.

18. On or about November 30, 2000, defendants **RHONDA STUBBS** and **TANYA THOMPSON** prepared a fraudulent Affidavit of Lost Certificate/Passbook and forged the signature of J.F. as well as that of his wife, E.J.F., on the affidavit. Defendants **STUBBS** and **THOMPSON** redeemed a certification of deposit belonging to J.F. in the amount of approximately \$26,912.93. Defendant **THOMPSON** divided up the proceeds; approximately \$6,000 in cash was withdrawn from Summit Bank's Wynnewood branch vault and converted to defendant **THOMPSON's** own use and approximately \$20,912.93 was deposited into a Summit Bank savings account maintained by J.A. ending with 9422.

All in violation of Title 18, United States Code, Section 1344.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1344, set forth in this indictment, defendants

**SHILBA BENNETT
RHONDA STUBBS, and
TANYA THOMPSON**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offense(s), including, but not limited to, the sum of \$518,320.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of

any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney